

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

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UNITED STATES OF AMERICA)
)
v.)
)
SARAH CARO)
)
)

CR. NO. 2:23cr59-MHT-SMD
[18 U.S.C. § 1920;
18 U.S.C. § 1001]

TREY GRANGER, CLK
U.S. DISTRICT COURT
MIDDLE DISTRICT ALA

INDICTMENT

The Grand Jury charges:

COUNT 1

(False Statement or Fraud to Obtain Federal Employee's Compensation)

From on or about July 7, 2020, through on or about August 17, 2020, in Montgomery County, in the Middle District of Alabama, and elsewhere, the defendant,

SARAH CARO,

in connection with the application for and receipt of disability compensation and benefits valued at \$1,000 or more under Title 5, United States Code, Chapter 81, Subchapters I and III (the Federal Employees' Compensation Act), knowingly and willfully falsified, concealed, and covered up a material fact from the Department of Labor, Office of Worker's Compensation Programs, in that the defendant signed, submitted and caused to be submitted, on or about the following dates, Forms CA-7, on which she indicated that she had no earnings and income from outside employment during the period covered by each form, when in fact she then and there knew that she had earnings and income from outside employment during those periods:

On or about Date	Period Covered by the Form
July 7, 2020	June 20, 2020 , to July 6, 2020
July 27, 2020	July 7, 2020, to July 17, 2020
August 4, 2020	July 18, 2020, to August 3, 2020
August 17, 2020	August 1, 2020, to August 17, 2020

All in violation of Title 18, United States Code, Section 1920.

COUNT 2
(False Statement)

On or about July 7, 2020, in Montgomery County, in the Middle District of Alabama, and elsewhere, the defendant,

SARAH CARO,

in a matter within the jurisdiction of the United States Department of Labor, an agency and department of the executive branch of the Government of the United States, willfully and knowingly made and used a false document knowing the same to contain a materially false, fictitious, or fraudulent statement, to wit: a false Form CA-7 that stated CARO had not received earnings and income from outside employment from June 20, 2020, to July 6, 2020, when she then and there knew that she had received earnings and income from outside employment during that time period, in violation of Title 18, United States Code, Section 1001.

COUNT 3
(False Statement)

On or about August 4, 2020, in Montgomery County, in the Middle District of Alabama, and elsewhere, the defendant,

SARAH CARO,

in a matter within the jurisdiction of the United States Department of Labor, an agency and department of the executive branch of the Government of the United States, willfully and knowingly made and used a false document knowing the same to contain a materially false, fictitious, or fraudulent statement, to wit: a false Form CA-7 that stated CARO had not received earnings and income from outside employment from July 18, 2020, to August 3, 2020, when she then and there knew that she had received earnings and income from outside employment during

that time period, in violation of Title 18, United States Code, Section 1001.

COUNT 4
(False Statement)

On or about August 17, 2020, in Montgomery County, in the Middle District of Alabama, and elsewhere, the defendant,

SARAH CARO,

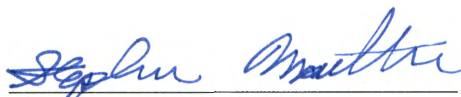
in a matter within the jurisdiction of the United States Department of Labor, an agency and department of the executive branch of the Government of the United States, willfully and knowingly made and used a false document knowing the same to contain a materially false, fictitious, or fraudulent statement, to wit: a false Form CA-7 that stated CARO had not received earnings and income from outside employment from August 1, 2020, to August 17, 2020, when she then and there knew that she had received earnings and income from outside employment during that time period, in violation of Title 18, United States Code, Section 1001.

A TRUE BILL:



Foreperson

SANDRA J. STEWART
UNITED STATES ATTORNEY



Stephen K. Moulton
Assistant United States Attorney